

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

<b>VANDROTH BACKUS, et al.,</b>	)	
<b>Plaintiffs,</b>	)	Civil Action No.: 3:11-03120-PMD-HFF-MBS
	)	
<b>v.</b>	)	<b>PLAINTIFFS' 26(a)(2) DISCLOSURE</b>
	)	<b>STATEMENT</b>
<b>STATE OF SOUTH CAROLINA, et al.,</b>	)	
<b>Defendants.</b>	)	

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Plaintiffs hereby certify compliance with Rule 26(a)(2), F.R.C.P. by serving counsel for all Defendants and identify the name of witnesses who may provide testimony pursuant to Federal Rules of Evidence 702, 703, and/or 705 as:

**Michael P. McDonald, Ph.D.**  
**Associate Professor, George Mason University**  
**Non-Resident Senior Fellow, Brookings Institution**  
**Department of Public and International Affairs**  
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Dr. Michael P. McDonald has been retained to provide an expert opinion testimony as described in his expert report that was provided to all Defendants along with all available information required within that subsection.

Respectfully submitted,

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